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U-005-455.17

**IMPLEMENTATION PLAN FOR THE OU 3 HIGH AND LOW NITRATE  
TANKS**

**04/04/96**

**USEPA            DOE-FN  
3  
COMMENTS**



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RECEIVED  
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APR 5 10 08 AM '95  
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

FILE: \_\_\_\_\_  
REPLY TO THE ATTENTION OF: \_\_\_\_\_

APR 04 1996

Mr. Johnny W. Reising  
United States Department of Energy  
Feed Materials Production Center  
P.O. Box 398705  
Cincinnati, Ohio 45239-8705

SRF-5J

RE : Implementation Plan for  
the OU 3 High and Low  
Nitrate Tanks

Dear Mr. Reising:

The United States Environmental Protection Agency (U.S. EPA) has completed its review of the United States Department of Energy's (U.S. DOE) draft Operable Unit (OU) 3 Implementation Plan for the above-grade dismantlement of the high and low nitrate tanks.

The implementation plan provides information supporting the removal of two tanks to allow for construction of haul roads as required by OU 1.

Although the plan is adequate there are a few issues that must be addressed. Therefore U.S. EPA approves the plan pending incorporation of adequate responses to U.S. EPA's attached comments. U.S. DOE must submit a revised plan with responses to comments and changed pages within thirty (30) days receipt of this letter.

Please contact me at (312) 886-0992 if you have any questions regarding this matter.

Sincerely,



James A. Saric  
Remedial Project Manager  
Federal Facilities Section  
SFD Remedial Response Branch #2

Enclosure

cc: Tom Schneider, OEPA-SWDO  
Jack Baublitz, U.S. DOE-HDQ  
John Bradburne, FERMCO  
Charles Little, FERMCO  
Terry Hagen, FERMCO  
Michael Yates, FERMCO

## GENERAL COMMENT

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 Commenting Organization: U.S. EPA Commentor: Saric  
 Section #: NA Page #: NA Line #: NA  
 Original General Comment #: 1

Comment: The implementation plan states that only the above-grade portions of the low nitrate tank (18K) and the high nitrate tank (18L) will be managed under the implementation plan. Remediation of the at- and below-grade portions of the tanks (for example the ancillary piping), which will be managed under the soil remediation project, is not within the scope of this project. The presence of ancillary piping associated with the tanks was not clearly discussed in the implementation plan; therefore, it was unclear whether any piping exists at or below grade. The presence of such piping interferes with the construction of the haul road for the on-site disposal facility (OSDF) and the proposed waste treatment facility for operable unit (OU) 1.

It is understood that soil remediation is beyond the scope of the OU3 remedial design and remedial action (RD/RA) work plan and provisions of the OU3 Remedial Design Prioritization and Sequencing Report (PSR); however, the reference to the soil remediation project is not sufficient. To date, the plan for the soil remediation project plan has not been submitted to the regulatory agencies and, therefore is not an enforceable plan. It is recommended that the text be revised to state that any at- or below-grade soil remediation be completed in accordance with the provisions set forth in the Final Record of Decision (ROD) for OU5 and the proposed soil remediation plan. The date of submission of the soil remediation plan should be included. In addition, any at- and below-grade soil that may be removed from under the tanks during dismantlement operations must be managed in accordance with the provisions set forth in Removal Action 17 (RvA 17), Revision 3 work plan.

## SPECIFIC COMMENT

Commenting Organization: U.S. EPA Commentor: Saric  
 Section #: NA Page #: 4 Lines #: 15 to 21  
 Original Specific Comment #: 1

Comment: The section titled Preparatory Actions states that a gravel road will be constructed around each tank before its contents are removed. The text further states that, in keeping with the philosophy of waste minimization through recycling and reuse of material, the gravel road will be scraped up at the completion of the project and reused in the foundation of the haul road. This approach is sound;

